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Re-evaluation Decision RVD2018-23

Iron (Present as ferric phosphate) and Its Associated End-use Products

Final Decision

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Re-evaluation Decision

Under the authority of the *Pest Control Products Act*, all registered pesticides must be regularly re-evaluated by Health Canada's Pest Management Regulatory Agency (PMRA) to ensure that they continue to meet current health and environmental safety standards and continue to have value. The re-evaluation considers data and information from pesticide manufacturers, published scientific reports and other regulatory agencies. The PMRA applies internationally accepted risk assessment methods as well as current risk management approaches and policies.

Iron (present as ferric phosphate) is used as a molluscicide to control snails and slugs in greenhouse crops, food crops, outdoor ornamentals and turf in both residential and commercial settings. Currently registered products containing iron (present as ferric phosphate) are listed in Appendix I.

This document presents the final regulatory decision[1] for the re-evaluation of iron (present as ferric phosphate) including the required updated risk mitigation measures to protect human health and the environment. All pest control products containing iron (present as ferric phosphate) that are registered in Canada are subject to this re-evaluation decision. This re-evaluation decision has undergone a 90-day consultation period as Proposed Re-evaluation Decision PRVD2017-21, *Iron (Present as ferric phosphate) and Its Associated End-use Products*.[2]

No comments were received during the consultation period. Therefore, this decision is consistent with the proposed re-evaluation decision stated in PRVD2017-21, which lists all data used as the basis for the re-evaluation decision.

Regulatory Decision for Iron (present as ferric phosphate)

The PMRA has completed the re-evaluation for iron (present as ferric phosphate). Under the authority of the *Pest Control Products Act*, the PMRA is granting continued registration of products containing iron (present as ferric phosphate) for sale and use in Canada. An evaluation of available scientific information found that the uses of iron (present as ferric phosphate) products do not present unacceptable risks to human health or the environment when used according to the conditions of registration, including amended label directions. Label amendments are required for end-use products as summarized below and listed in Appendix II. No additional data are requested at this time.

Under the authority of the *Pest Control Products Act*, the PMRA has determined that continued registration of products containing iron (present as ferric phosphate) is acceptable.

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1 "Decision statement" as required by subsection 28(5) of the *Pest Control Products Act*.

2 "Consultation statement" as required by subsection 28(2) of the *Pest Control Products Act*.

Risk Mitigation Measures

Registered pesticide product labels include specific direction for use. Directions include risk mitigation measures to protect human health and the environment and must be followed by law. The following label amendments are included as part of the re-evaluation:

- Environmental hazard label statements to both commercial and domestic products;
- Storage label statements; and
- Statement to keep out of reach of pets

Next Steps

To comply with this decision, the required mitigation measures must be implemented on all products labels sold by registrants no later than 24 months after the publication date of this decision document. Appendix I lists the pesticide products containing iron (present as ferric phosphate) registered under the authority of the *Pest Control Products Act.*

Other Information

Any person may file a notice of objection[3] regarding this decision on iron (present as ferric phosphate) within 60 days from the date of publication of this Re-evaluation Decision. For more information regarding the basis for objecting (which must be based on scientific grounds), please refer to the Pesticides section of Canada.ca website (Request a Reconsideration of Decision) or contact the PMRA's Pest Management Information Service.

[3] As per subsection 35(1) of the *Pest Control Products Act.*

Appendix I Currently Registered Products Containing Iron (Present as ferric phosphate) (as of 6 April 2018[1])

Reg No.	Marketing Class	Registrant	Product Name	Formulation	Guarantee
26101	Technical	W. Neudorff GmbH KG	FERRIC PHOSPHATE TECHNICAL	solid	29%
26102	Domestic	W. Neudorff GmbH KG	SLUGGO SLUG & SNAIL BAIT FOR GARDENS	granular	0.28%
26199	Manufacturing	W. Neudorff GmbH KG	NEU1165M MANUFACTURING CONCENTRATE	granular	0.28%
27085	Commercial	W. Neudorff GmbH KG	FERRAMOL SLUG AND SNAIL BAIT	granular	0.28%
28375	Domestic	Scotts Canada Ltd.	ORTHO® SLUG B GON® ECO SLUG AND SNAIL BAIT	granular	0.28%
29120	Domestic	Gardens Alive Inc.	ESCAR-GO SLUG AND SNAIL BAIT	granular	0.28%
30025	Commercial	Engage Agro Corporation	SLUGGO PROFESSIONAL SLUG AND SNAIL BAIT	granular	0.28%
31815	Technical	Scotts Canada Ltd.	SCOTTS FERRIC PHOSPHATE	solid	29.78%
31816	Domestic	Scotts Canada Ltd.	SCOTTS® ECOSENSE® SLUG B GON® SLUG AND	pellets	0.2978%
32841	Domestic	753146 AB LTD. O/A ULTRASOL INDUSTRIES	DOKTOR DOOM PREMIUM SLUG AND SNAIL BAIT	granular	0.28%

[1] As of 6 April 2018, excluding discontinued products or products with a submission for discontinuation.

Appendix II Label Amendments for Products Containing Iron (present as ferric phosphate)

The label amendments presented below do not include all label requirements for individual end-use products, such as first aid statements, disposal statements, precautionary statements, and supplementary protective equipment. Information on labels of currently registered products should not be removed unless it contradicts the label statements provided below.

I) The following statements **MUST BE REMOVED** from all sections of the label.

Commercial and Domestic Class Products:

"WILL NOT HARM PETS, BIRDS, OR WILDLIFE"

"KEEP OUT OF REACH OF CHILDREN"

II) The following principal display panel statements must be added:

Commercial and Domestic Class Products:

"KEEP OUT OF REACH OF CHILDREN AND PETS"

III) Under **PRECAUTIONS**, the following statements must be added:

Commercial Class Products:

"KEEP OUT OF REACH OF CHILDREN AND PETS"

Domestic Class Products:

"KEEP OUT OF REACH OF CHILDREN AND PETS"

IV) The following statements must be included in a section entitled **ENVIRONMENTAL HAZARDS**.

Commercial Class Products:

"To reduce runoff from treated areas into aquatic habitats avoid application to areas with a moderate to steep slope, compacted soil, or clay."

"Avoid application when heavy rain is forecast."

"Contamination of aquatic areas as a result of runoff may be reduced by including a vegetative strip between the treated area and the edge of the water body."

V) The following statements must be included in a section entitled **DIRECTIONS FOR USE:**

Commercial Class Products:

"DO NOT contaminate irrigation or drinking water supplies or aquatic habitats by cleaning of equipment or disposal of wastes."

"As this product is not registered for the control of pests in aquatic systems, DO NOT use to control aquatic pests."

"DO NOT apply by air."

Domestic Class Products:

"DO NOT contaminate irrigation or drinking water supplies or aquatic habitats by cleaning of equipment or disposal of wastes."

VI) The following statements must be included in a section entitled **STORAGE:**

Commercial and Domestic Class Products:

"To prevent contamination, store this product away from food or feed."

VII) The following must be included in a section entitled **DISPOSAL**:

Domestic Class Products:

"DO NOT reuse the empty containers. Dispose in household garbage."

"Unused or partially used products should be disposed at provincially or municipally designated hazardous waste disposal sites."